

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

NICHOLAS PENTONY,

Debtor

Chapter 13

Case No. 19-16970 ELF

Hearing Date: February 25, 2020

Hearing Time: 10:00am

Location: Robert N.C. Nix Sr. Federal Courthouse
900 Market Street
Philadelphia, PA 19107
Courtroom 1

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION
TO DISMISS

WHEREFORE, Debtor requests that this Honorable Court DENY the Motion for Dismissal for the following reasons:

1. Debtor has a new job and is waiting for pay advices.
2. Debtor was having some financial difficulty but has since retained more stable employment. Any outstanding amount will be paid on or before the hearing date.
3. Debtor is capable of completing the plan and wishes to remain under the protection of the Bankruptcy Code.
4. Undersigned counsel is in communication with the Trustee's office to amicably resolve the motion prior to the scheduled hearing.

Respectfully Submitted,

KASHKASHIAN, DOVER & ASSOCIATES

/s/ ANDRE DOVER

Andre Dover, Esquire

Attorney for Debtor

Attorney ID 312565

10 Canal Street, Suite 204

Bristol, PA 19007

215-781-9500

Date: 1/30/20

United States Bankruptcy Court
Eastern District of Pennsylvania

In re Nicholas J Pentony

Debtor(s)

Case No. 19-16970

Chapter 13

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2020, a copy of ____ was served electronically or by regular United States mail to all interested parties, the Trustee and all creditors listed below.

Bucks Co Drs

Lynv Funding Llc

Pa Housing Finance Age

Pnc Bank, N.a.

Receivable Management

Thd/cbna

U S Dept Of Ed/Gsl/Atl

U S Dept Of Ed/Gsl/Atl

U S Dept Of Ed/Gsl/Atl

U S Dept Of Ed/Gsl/Atl

U S Dept Of Ed/Gsl/Atl

U S Dept Of Ed/Gsl/Atl

Us Bk Rms Cc

Verizon

/s/ Andre Dover

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